

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA



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Order Instituting Rulemaking to Implement the
Commission's Procurement Incentive Framework and to
Examine the Integration of Greenhouse Gas Emissions
Standards into Procurement Policies.

Rulemaking 06-04-009
(Filed April 13, 2006)

**COMMENTS OF THE CENTER FOR ENERGY EFFICIENCY AND RENEWABLE
TECHNOLOGIES ON THE PROPOSED DECISION OF PRESIDENT PEEVEY**

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February 28, 2008

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The Center for Energy Efficiency and Renewable Technologies (CEERT) respectfully submits these Comments on the Proposed Decision of Commission President Peevey, which was mailed in this proceeding on February 8, 2008. These Comments are filed and served pursuant to Article 14 and Rules 1.9, and 1.10 of the Commission's Rules of Practice and Procedure and the instructions accompanying the Proposed Decision.

**I.
THE PROPOSED DECISION ERRS IN MAKING KEY FINDINGS AND
RECOMMENDATIONS THAT ARE INCONSISTENT WITH COMMISSION POLICY,
ARE NOT SUPPORTED BY A ROBUST DISCUSSION OF THE RECORD, AND
PREJUDGE THE OUTCOME OF PENDING ISSUES IN OTHER PROCEEDINGS.**

There is no doubt that AB 32, which requires that statewide greenhouse gas (GHG) emissions be reduced to 1990 levels by 2020, presents significant challenges for all state agencies and stakeholders who share a common interest in ensuring that this goal is achieved.¹ CEERT, which strongly supports this GHG emissions reduction goal, appreciates the complexity of the tasks before this Commission and the California Energy Commission (CEC), especially in developing and adopting joint recommendations for inclusion in the California Air Resources Board's (CARB's) AB 32 implementation scoping plan. The Commission and the CEC have

¹ AB 32 (Ch. 488, Stats 2006, adding California Health and Safety Code §§38500, et seq).

requested substantial party comment on a number of issues thus far, and CEERT recognizes that distilling the entire record into one PD is no small task.

However, the Commission still has a duty to clearly support key findings by reference to the record, maintain consistency with Commission policy and precedent, and resist prejudging the outcome of pending issues being addressed in other proceedings. The Proposed Decision fails in this regard in three major ways:

1. The Proposed Decision reaches findings at odds with Commission policy, which, to date, has embraced a strong renewable generation future for California, including support for integrated resource planning and a 33% renewable requirement by 2020, and ignores ongoing efforts to reform programs and processes to bring more renewable projects on-line;
2. The Proposed Decision inappropriately prejudices issues affecting renewables procurement that are pending in other proceedings; and,
3. By failing to provide citation to or discussion of the record in support of its findings of broad benefits of a cap-and-trade approach to AB 32 compliance, the Proposed Decision does not adequately substantiate or support those claims and does not demonstrate how its ultimate recommendations comply with statutory requirements in AB 32.

Each of these shortcomings of the Proposed Decision is discussed further below. CEERT respectfully requests that the Commission modify the Proposed Decision to correct these errors, consistent with CEERT's proposed modifications to the findings of fact, conclusions of law, and ordering paragraphs, contained in Appendix A hereto.

A. The Proposed Decision Inappropriately Limits Future Increases in Renewable Generation as a Direct Means of Reducing GHG Emissions in Conflict with Commission Policy and with Commission Action Aimed at Overcoming Current Barriers to Renewable Generation.

The task that is before this Commission and the California Energy Commission (CEC), and ultimately the CARB, is to decide whether or not a renewable future is the right course for California or if the state is to rely on some other (as yet unidentified) generation resource to meet our carbon emission reductions. Clearly, the state, by its own current policies, has made a very clear commitment to a renewable future by doing all of the following:

1. The Legislature's enactment of the current Renewable Portfolio Standard (RPS) Program law requiring obligated load serving entities (LSEs) to procure 20% of their electric demand from renewable resources by 2010 (PU Code §399.11, et seq.);
2. The policy commitment of the the Governor, Climate Action Team, and pending legislation, to increase the RPS goal to 33% renewables by 2020;
3. The statutory mandate in AB 32 to reduce overall GHG emissions to 1990 levels by 2020;
4. The Governor's Executive Order S-3-05 calling for GHG emissions to be reduced to 80% below 1990 levels by 2050; and
5. Reliance on integrated resource planning to show a pathway to achieving policies 1 through 4 on this list.

Clearly, the actions and recommendations of this Commission, the CEC, CARB, and the Legislature for achieving GHG emissions reductions must be consistent with these policy goals. In this regard, CEERT fully supports these agencies' intention to continue mandatory energy efficiency and renewable programs,² which are critical to guaranteeing GHG emissions reductions in the electricity sector and investment in new and existing clean technology. As stated in the Proposed Decision, these programs are absolutely "the foundation upon which our

² See, e.g., Proposed Decision, at p. 30.

other additional AB 32 policies should be built.”³ CEERT also fully supports the Proposed Decision’s recommendation “that the cap-and-trade system need only produce a relatively small portion of the overall emissions reductions” and that CARB should “design it as a complement to existing policies and their expansion.”⁴ CEERT notes that the Proposed Decision also appropriately reiterates the directive of the “loading order” for electricity resources in the Energy Action Plan in its Finding of Fact 1.

However, the Commission and the CEC must go further in their recommendations to CARB to clearly and definitively state that direct investment in energy efficiency and renewable and distributed generation will be given preference over the trading and purchase of emissions allowances from other sectors in the economy. The Proposed Decision must be modified to ensure that this goal, consistent with state policy, is embedded in its recommendations as discussed below.

1. The Proposed Decision Must Recommend a 33% Renewables Procurement Requirement to the CARB and Legislature.

This state’s RPS law, its GHG policy, and world-class solar resources are attracting a number of international renewable energy companies to California, such as Acciona, Abengoa/Solucar, EDF, Solar Millenium, and Solel. A 33% renewables requirement, with necessary reforms, will send a clear and sure signal to investors and renewable energy companies that California intends to develop our resources as a matter of state policy and should, therefore, be expressly included in the Commissions’ list of core recommendations to the CARB and the legislature for AB 32 scoping plan development.

The Proposed Decision, however, turns back from both the state’s commitment to clearly mandated increases in renewable standards and does not mention the dedication of several

³ Proposed Decision, at p. 30.

⁴ Proposed Decision, at p. 33.

agencies to addressing barriers to new renewable development in California. These barriers are most recently described in both the 2008 Energy Action Plan Update, the final report of the Economic and Technology Advancement Advisory Committee (ETAAC), and the CEC's Integrated Energy Policy Report (IEPR).

The 2008 Energy Action Plan Update, released just this month, stated enthusiastically that the Energy Action Team is dedicated to working towards the 33% RPS goal:

“In EAP II, we are committed to working together to evaluate the potential for making 33 percent of the power delivered in California renewable by 2020. Today, we strengthen our commitment to increasing the electricity generation from renewable energy in California and throughout the West. Since our Renewable Portfolio Standard (RPS) was adopted, most other states in the West have also adopted RPS requirements. To meet the AB 32 emissions reduction goal in 2020, or the even more aggressive goal suggested by the Governor's executive order S-3-05 for 2050, we will need to maximize the development of renewable resources throughout the West.”⁵

The Energy Action Team also correctly recognizes the barriers to achieving the 33% target and commits to “aggressively” overcoming those hurdles:

“Furthermore, many of the approved projects still must successfully overcome project development obstacles, such as permitting, siting, and the development of new transmission. To achieve a 33 percent goal, we need to implement some aggressive programmatic changes.”⁶

Further:

“The 2007 IEPR describes a number of obstacles that impede our ability to reach our RPS targets and makes recommendations for their removal. The first obstacle that was highlighted was the lack of transmission access from the areas rich in renewable resources to the load centers. The IEPR noted a number of efforts underway to mitigate the problems with transmission siting, most encouragingly, the creation of the Renewable Energy Transmission Initiative, which is a statewide planning collaborative among the Public Utilities Commission, Energy Commission, California ISO, and a number of public power entities to identify and plan for the development of renewable energy zones within California. Further, the IEPR urged a joint consideration by our two agencies of a feed-in

⁵ 2008 Energy Action Plan Update (February 2008), at p. 12.

⁶ Id.

tariff for all renewable energy projects to replace the cumbersome, opaque contracting process that renewable developers face.”⁷

Section 38591, added by AB 32 to the Health and Safety Code, creates the ETAAC to advise the CARB on “*activities that will facilitate investment in and implementation of technological research and development opportunities.*”⁸ The ETAAC is a diverse group of stakeholders from business and academia that has been meeting since March 1, 2007. Since then, the ETAAC has produced a set of recommendations for technology and policy options for California to meet its GHG emission reduction requirements. The final ETAAC report was formally submitted into the record at the CARB Board Meeting today (February 28, 2008). Among the many recommendations in that report, the ETAAC “*recommends that California take steps necessary to support an increase of renewable energy to 33 percent by 2020 for all Load Serving Entities (LSE) as a way to meet the State’s AB 32 climate change goals,*”⁹ and correctly points out that “*(a) focused, massive commitment on the part of California’s policymakers is essential.*”¹⁰

Further, the benefits of renewables are not limited solely to creating an energy supply that reduces GHG emissions. As long-recognized in statute, renewable electric generation not only provides economic benefits for the state, but also “*ameliorate[s] air quality problems through the state and improve[s] public health by reducing the burning of fossil fuels and the associated environmental impacts and by reducing in-state fossil fuel consumption.*”¹¹

For these many reasons, the Proposed Decision must be modified to fully integrate the 33% renewables goal into its recommendations to CARB. CEERT recommends modifications to

⁷ *Id.*, at p. 13.

⁸ Cal. Health & Safety Code §38591.

⁹ Recommendations of the Economic and Technology Advancement Advisory Committee (ETAAC) FINAL REPORT. February 11, 2008, at pp. 5-9; emphasis added.

¹⁰ *Id.*, at pp. 5-8; emphasis added.

¹¹ PU Code §399.11(b) and (c).

the Proposed Decision's findings, conclusions, and orders in Appendix A hereto consistent with that needed change.

2. The Proposed Decision Must Recognize and Recommend Ongoing Integrated Resource Planning as Necessary to Meet GHG Emission Reduction Requirements and Goals.

GHG emissions reduction and the 33% renewables target are interrelated goals that will have the greatest impact on utility electric generation procurement in the next 10 to 12 years. By 2020, the investor-owned utilities (IOUs) will be required by AB 32 to reduce their GHG emissions to 1990 levels and by adopted Commission policy to increase procurement from renewable resources to meet 33% of their electric retail sales. IOUs must be required to effectively plan today to meet these interconnected goals.

In D.07-12-052, issued in December 2007 in the Commission's long-term procurement plan (LTPP) proceeding (R.06-02-013), is of critical importance to and must be fully integrated and reflected in the Commission's AB 32 scoping plan recommendations to CARB. In this regard, the Commission has determined that "[e]ach LTPP proceeding [including R.06-02-013] serves as the umbrella proceeding for the Commission to consider, in an integrated fashion, all of the Commission's electric resource procurement policies and programs, including implementation of directives from other procurement-related proceedings," including R.06-04-009.¹² In fact, the "primary focus" of D.07-12-052 was to determine whether the LTPPs ensure that the IOUs are "procuring preferred resources as set forth in the Energy Action Plan" and are appropriately responding to "policies that promote the reduction of greenhouse gases (GHG), especially in the production and delivery of electric resources by the [regulated] utilities."¹³

¹² D.07-12-052, at pp. 5, 9.

¹³ D.07-12-052, at p. 2.

In making this determination, the Commission in D.07-12-052 found that the LTPPs of all three IOUs (Southern California Edison Company (SCE), Pacific Gas and Electric Company (PG&E), and San Diego Gas and Electric Company (SDG&E)) “were deficient and spotty in regards to addressing filling their net short position with preferred resources from the EAP loading order and particularly inadequate in accounting for GHG emission reductions.”¹⁴ In reaching this conclusion, the Commission confirmed its ongoing, firm commitment to pursuing a path toward reduced GHG emissions and meeting the state’s GHG emission reduction goals identified in, among other things, Assembly Bill (AB) 32 and the Governor’s Executive Order (EO) S-3-05.¹⁵

The Commission further insisted that LTPP filings “for our regulated utilities” must “not only conform to the energy and environmental policies in place, but aim for even higher levels of performance.”¹⁶ Such direction is essential not only to meet AB 32 targets, but also to put the electric system on a path to increasing sustainability and achievement of 80% GHG emission reductions below 1990 levels by 2050, as articulated in the Governor’s EO S-3-05.

In D.07-12-052, the Commission acknowledged that details regarding AB 32 implementation “are still under consideration in [R.] 06-04-009,”¹⁷ but nevertheless concluded:

- “The overarching problem in all three LTPPs is the absence of any scenario analysis regarding what types of resources the IOUs should use to fill their net short positions to best transition to the inevitably GHG-constrained world we are moving towards.”¹⁸
- “[I]t would be prudent for the IOUs to make reasonable assumptions and/or develop reasonable scenarios regarding different mixes of preferred resources and the operational characteristics of additional fossil generation that the IOUs will

¹⁴ D.07-12-052, at p. 3.

¹⁵ D.07-12-052, at pp. 4, 230-232.

¹⁶ D.07-12-052, at p. 4.

¹⁷ D.07-12-052, at p. 5.

¹⁸ D.07-12-052, at p. 5.

need to reduce their carbon emissions from electric generation resources back to, at a minimum 1990 levels.”¹⁹

- “Informed decision-making depends on robust analysis,” and “[w]hile we recognize that electric resource planning is inherently uncertain, perhaps now more than ever before, we expect the IOUs to integrate the best, most recent planning methodologies and analytical techniques.”²⁰
- “We agree with parties that find areas that could be improved on throughout the IOUs’ planning process from planning assumptions and scenario development, to candidate portfolios and portfolio analysis, and ultimately, evaluation and final selection of a preferred portfolio.”²¹

The Commission concluded that “[w]hile the implementation details are still under consideration in R.06-04-009, it appears improbable that the IOUs can reduce their carbon emissions from electric generation resources back to 1990 levels without a focused reliance on preferred resources.”²² The Commission also found that “[p]rocurement of zero- or low-GHG resources should be given preference over other resources since these are the types of resources that AB 32 regulations will favor,” and that “uncertainty” in the LTPPs would be eliminated by application of “established scenario analysis going forward.”²³

For next steps, consistent with these findings, the Commission concluded that “analyses presented by IOUs should be detailed enough to enable adequate analysis of fuel mix under various scenarios, overall cost to customers, risks faced by customers, and environmental impact.”²⁴ Specifically:

“To further flesh out IOU plans for GHG reductions, we will provide directions in upcoming LTPP proceedings concerning the development of a consistent evaluation of the costs and risks of GHG-reduction to be included in the subsequent LTPPs. These analyses will be based on the recommendations provided by CEERT in this proceeding, modified based on the results of Phase II of R.06-04-009.”²⁵

¹⁹ D.07-12-052, at pp. 5-6.

²⁰ D.07-12-052, at p. 6.

²¹ D.07-12-052, at pp. 6-7.

²² D.07-12-052, at p. 243.

²³ D.07-12-052, at pp. 75, 244.

²⁴ D.07-12-052, at p. 245.

²⁵ D.07-12-052, at pp. 244-245; emphasis added.

These important directives are virtually ignored in the Proposed Decision. Because of their singular importance to achieving AB 32 goals, CEERT asks that the Commission correct this error and ensure that integrated resource planning is among the Commission's recommendations to CARB.

B. The Proposed Decision's Discussion of "Null Power" Associated with Renewable Has No Record Support, Has the Effect of Prejudging the Outcome of Issues Pending In Another Proceeding, and Should be Removed or Modified.

In its discussion of the adopted "deliverer point of regulation" for AB 32 compliance, the Proposed Decision correctly states with respect to renewable generation:

"The [GHG] emission profile of most renewable generation will be considered to be zero for most technologies. Therefore, entities that deliver power produced from such [renewable] sources to the California grid would not be required to obtain and retire allowances."²⁶

The only appropriately noted exception would be *if* the renewable generation "has GHG emissions," in which case it "would be treated like any other generation, in that the deliverer would have a GHG emissions compliance obligation."²⁷

Despite these conclusions, the Proposed Decision then goes on to state that "future developments regarding tradable RECs [renewable energy credits]" in the RPS proceeding, R.06-02-012, could alter this determination. In this regard, the Proposed Decision states:

"If the definition of RECs to be developed in that proceeding were to specify that GHG emission attributes are embedded in RECs, and if a renewable generator were to sell unbundled RECs to an entity that uses the RECs for GHG emission compliance purposes, it may be appropriate to hold the deliverer of the resulting null power to the California grid responsible for surrendering allowances associated with the null power."²⁸

The Proposed Decision further observes *and* concludes:

²⁶ Proposed Decision, at p. 68.

²⁷ Proposed Decision, at p. 68.

²⁸ Proposed Decision, at p. 68.

“[O]ther jurisdictions may define RECs differently for use in other markets, including ... compliance with GHG emissions requirements, [and]... [t]hus, on a broader basis it may be appropriate to hold any deliver of power generated from renewable sources to the California grid responsible for emission allowance requirements if a REC associated with that power has been defined to include GHG emission attributes and the REC, separately from the power, has been sold into a market to be used for GHG emission compliance purposes. If such developments occur, ARB may need to address the treatment of null power in its reporting and compliance regulations.”

From CEERT’s perspective, this dicta about “null power” and the impact of tradable RECs is completely unsupported by any record in this proceeding and completely misses the point of the consideration being given to this issue in R.06-02-012. The *only* correct statement made by the Proposed Decision in this regard is that the Commission is *considering* whether to permit tradable RECs to be used for RPS compliance. While CEERT’s believes that a decision on this issue is long overdue, CEERT clearly assumes that *this* Proposed Decision, which makes no effort to cite to any part of the record in R.06-02-012, will not serve to inappropriately *prejudge* any aspect of a final Commission decision on tradable RECs in the proceeding in which it is being considered and on which a substantial record has been developed (R.06-02-012).

Put simply, the only issue before the Commission *on any record in any proceeding before it* on tradable RECs is whether an unbundled REC can be used for RPS compliance.²⁹ The *different* question of how a “deliverer” of renewable generation that unbundles and sells the REC separately should be treated in the context of GHG compliance has *not* been addressed in either this proceeding or R.06-02-012. Until that analysis has been undertaken with notice and a full and fair opportunity to be heard, the Commission must abstain from making unsupported

²⁹ See, e.g., R06-02-012 (RPS) CEERT Post-Workshop Comments on Tradable RECs (November 11, 2007), at pp. 11-12.

statements or “guesses” about that outcome, especially in suggesting how or whether CARB should treat the resulting “null power” in its reporting and compliance regulations.³⁰

In fact, there is no basis (and certainly none cited) for the Proposed Decision to alter the Commission’s determination in D.07-01-039:

“[T]he emissions of a renewable facility will not change if or when it sells RECs under a future regulatory REC market. Nor will RECs count toward compliance with the interim EPS [emissions performance standard] by those LSEs who may purchase them for RPS compliance purposes in the future.”³¹

While these findings were made specific to the EPS (Senate Bill (SB) 1368) and the Commission reserved judgment on treatment of null renewable power in the context of AB 32, the Commission simply does not have a record sufficient to reach any different conclusion here. Thus, whether in issuing D.07-01-039 or *now*, the available record on this issue remains unchanged. Namely, “there is no regulatory REC market in California at this time,” and the Commission is still apparently not prepared to “predict ... whether, how or when a REC market will develop in California.”³² Further, no new record since D.07-01-039 exists to alter the Commission findings in that decision that a zero emission status should be maintained for renewable generation regardless of whether the REC is unbundled or not since. That decision was informed by the Commission’s conclusions that, among other things, “stripping renewables of their emission profiles in this manner could easily create a ‘perverse’ result [of] discourag[ing] long-term commitments with renewable generators that have zero, low or even negative net GHG emission profiles in favor of resources with higher emission rates” and could lead to inconsistent treatment of RECs between LSE-owned and non-LSE owned baseload renewable

³⁰ Proposed Decision, at p. 69.

³¹ D.07-01-039, at p. 125.

³² D.07-01-039, at p. 121.

generation.³³ The Commission also found that it has no “reasonable method” for imputing null power with something other than the facility’s actual emissions.”³⁴

Finally, whatever the Commissions ultimately decides regarding how to handle RECs and GHG emission reduction obligations, it is obviously burdensome to require renewable generators to purchase allowances at any price. Assuming that the allowance value for renewable resources could artificially be determined to be zero, the allowances would then have to be immediately retired to avoid the opportunity for double counting. Under these circumstances, renewable generators or first deliverers of renewable generation must be exempted, at the very least, from *paying for allowances whether or not* the electricity has been unbundled from its REC.

C. The Proposed Decision Does not Adequately Discuss the Basis or Record Support for The Commission’s Recommended Adoption of a Broad Cap and Trade System.

The Commission has asked for extensive sets of comments on a multitude of issues in this proceeding. CEERT’s focus in this proceeding, as well as at the CARB and other venues, is on policies and measures that will *directly* result in reductions in GHG emissions. CEERT has taken no position on the merits of a cap-and-trade system on its own, but continues to assert that direct emissions reduction measures and integrated resource planning must be the focus for reducing GHG emissions in the electricity sector.

CEERT is concerned, however, that the Proposed Decision makes broad claims about the benefits of a cap-and-trade system that are not substantiated by any discussion of the record in the PD. CEERT notes that this approach does not match the typical rigor and quality of Commission decisions in discussing the record when reaching its findings and conclusions, particularly on such a major policy recommendation in favor of a cap-and-trade system.

³³ D.07-01-039, at pp. 122, 124.

³⁴ D.07-01-039, at p. 125.

Further, the Proposed Decision neither mentions nor states how its finding and recommendation of a cap-and-trade system complies with three critical mandates in AB 32. Specifically, California Health and Safety Code §§38501, 38561, and 38570 require CARB: (1) to “design emission reduction measures” in a manner that “minimizes costs and maximizes benefits for California's economy, improves and modernizes California's energy infrastructure and maintains electric system reliability, maximizes additional environmental and economic co-benefits for California, and complements the state's efforts to improve air quality,”³⁵ (2) to use, in doing so, “the best available economic models, emission estimation techniques, and other scientific methods,” and includes the use of “market-based compliance mechanisms to comply with the regulations” *only* if “the potential for direct, indirect, and cumulative emission impacts from these mechanisms, including localized impacts in communities that are already adversely impacted by air pollution” has been considered,³⁶ and (3) to “design” that mechanism in a manner that “prevent(s) any increase in the emissions of toxic air contaminants or criteria air pollutants, and “[m]aximize[s] additional environmental and economic benefits for California, as appropriate.”³⁷ Given the manner in which the agencies have divided their workload in order to reasonably and effectively achieve the directive of AB 32, these provisions also apply to this Commission and the CEC in offering their recommendations on the Scoping Plan to CARB.

Finally, AB 32 provides that the Scoping Plan adopted by the ARB will be continually reviewed at least twice a decade to update with new information.³⁸ Under these circumstances, the Scoping Plan, at a very minimum must be updated and modified the first time by 2014. Now is not the time for the Commission and the CEC to retract policies and targets, which they have

³⁵ Cal. Health & Safety Code §38501.

³⁶ Cal. Health & Safety Code §38561.

³⁷ Cal. Health & Safety Code §38570.

³⁸ Cal. Health and Safety Code §38561(h).

already supported, or to decline to show leadership in transitioning California to a clean energy economy and future. The Proposed Decision should, therefore, be modified to add support for its findings on the benefits of a cap-and-trade system, especially exclusive of other programs and measures that will actually reduce GHG emissions, or eliminate the findings altogether.

II.

CONCLUSION: NEEDED MODIFICATION OF THE PROPOSED DECISION

For the reasons stated above, it is CEERT's position that the Proposed Decision must be modified to correct the identified shortcomings and errors. To that end, CEERT proposes specific changes to the Proposed Decision's Findings of Fact, Conclusions of Law, and Ordering Paragraphs in Appendix A hereto. CEERT also asks that discussion in the Proposed Decision be modified to provide needed record support and citation.

Respectfully submitted,

February 28, 2008

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APPENDIX A

CEERT'S PROPOSED MODIFICATIONS TO THE PROPOSED DECISIONS FINDINGS OF FACT, CONCLUSIONS OF LAW, AND ORDERING PARAGRAPHS

CEERT proposes that the following changes be made to the Proposed Decision's findings of fact, conclusions of law, and ordering paragraphs, consistent with its comments hereto. In this regard, it is CEERT's position that the Proposed Decision cannot include findings for which there has been no full and robust discussion of and citation to the record in support, and showing of how these provisions are beneficial to California's ratepayers, environment and economy, and comply with clear directives of AB 32. Alternatively, the Commission could amend the PD with a full discussion of the record in support of these findings of fact, conclusions of law and ordering paragraphs.

All additions and strikethroughs are shown in bold type.

Proposed Modifications to Findings of Fact:

6. It is reasonable that existing California policies regarding energy efficiency building codes and appliance efficiency standards, retail provider energy efficiency programs, the renewables portfolio standard program, and the emissions performance standard be maintained,~~—and~~ **strengthened, and targets clearly and firmly increased, including a minimum of 33% renewables by 2020. ~~as recommended in this decision.~~**
7. ~~For the electricity sector, a cap-and-trade system, in conjunction with the continuation and strengthening of existing policies regarding energy efficiency building codes and appliance efficiency standards, retail provider energy efficiency programs, the renewables portfolio standard program, and the emissions performance standard as recommended in this decision, is likely to be a less expensive means of complying with AB 32 GHG emission reduction requirements than sole reliance on existing and increased mandatory programmatic requirements.~~
8. ~~For the electricity sector, GHG emissions trading would maximize flexibility in achieving emissions targets by allowing obligated entities to rely on least-cost options across the entire economy.~~
9. ~~For the electricity sector, a GHG emissions cap-and-trade program would encourage investment in research and innovation in technologies that lower GHG emissions.~~

41. Nothing in this decision is intended to prejudge, or recommend action that would prejudge, the outcome of the Commission's pending consideration of the use of renewable energy credits for RPS compliance.
42. For the electricity sector, continued and increased reliance on energy efficiency, demand response, and renewable generation resources, including but not limited to a minimum 33% RPS, and focused commitment on achieving will encourage expanded investment existing technologies in research and innovation in technologies that lower GHG emissions. Continued and increased reliance on energy efficiency, demand response, and renewable generation resources is the centerpiece and should continue to be the first priority for greenhouse gas emissions reductions.
43. For the electricity sector, consistent with our decision in D.07-12-052 with regard to the IOUs' long-term procurement plans, long-term integrated resource planning is now, and will continue to be, an essential approach to achieving greenhouse gas emissions reductions.

Proposed Modification to Conclusion of Law 3:

2. SB 1068 as amended by SB 107 requires that IOUs, CCAs, ESPs, and POUs obtain at least 20% of delivered electricity from renewable sources by 2010, **and it is Commission policy to encourage increased procurement of renewable resources by RPS-obligated load serving entities to meet 33% of their customers' electricity demand by 2020 and to eliminate all obstacles to meeting that goal as expeditiously as possible.**

Proposed Modification to Ordering Paragraphs 3 and 4:

3. We recommend that ARB work with the Public Utilities Commission and the Energy Commission to set requirements that all retail providers of electricity must deliver more than 20 percent of their power from renewable sources in the future, **at least to achieve 33% renewables by 2020.**
4. We recommend that, if ARB concludes that it does not have authority to adopt regulations consistent with Ordering Paragraphs 1 and 2, **the Public Utilities Commission and the Energy Commission commit to work with ARB to seek such authority from the Legislature.**
10. We recommend that, for the electricity sector, consistent with our decision in D.07-12-052 with regard to the IOUs' long-term procurement plans, long-term integrated resource planning is now, and will continue to be, an essential approach to achieving greenhouse gas emissions reductions

CERTIFICATE OF SERVICE

I, Sara Steck Myers, am over the age of 18 years and employed in the City and County of San Francisco. My business address is 122 - 28th Avenue, San Francisco, California 94121.

On February 28, 2008, I served the within document **COMMENTS OF THE CENTER FOR ENERGY EFFICIENCY AND RENEWABLE TECHNOLOGIES ON THE PROPOSED DECISION OF PRESIDENT PEEVEY**, in R.06-04-009, with prescribed electronic and mail service and delivery of paper copies by U.S. Mail to Assigned Commissioner Peevey, Assigned ALJs TerKeurst and Lakritz, and Commissioner Peevey's advisor, Nancy Ryan, at San Francisco, California.

Executed on February 28, 2008, San Francisco, California.

/s/ SARA STECK MYERS

Sara Steck Myers

ELECTRONIC AND MAIL SERVICE LIST
R.06-04-009 (GHG)
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